

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

In re:	§	
	§	CHAPTER 11
USA DRY VAN LOGISTICS, L.L.C.	§	
	§	CASE NO. 10-20102
Debtor.	§	
	§	
In re:	§	
	§	CHAPTER 11
GOLAGALE HOLDINGS, L.L.C.	§	
	§	CASE NO. 10-20103
Debtor.	§	
	§	
In re:	§	
	§	CHAPTER 11
USA LOG. CARRIERS, L.L.C.	§	
	§	CASE NO. 10-20107
Debtor.	§	
	§	
In re:	§	
	§	CHAPTER 11
USA LOGISTICS CARRIERS, L.L.C.	§	
	§	CASE NO. 10-20108
Debtor.	§	
	§	
In re:	§	
	§	CHAPTER 11
NORTH AMERICAN TRAILER RENTALS, L.L.C.	§	
	§	CASE NO. 10-20105
Debtor.	§	
	§	
In re:	§	
	§	CHAPTER 11
LA&G INVESTMENT CO, L.L.C.	§	
	§	CASE NO. 10-20104
Debtor.	§	
	§	

In re:	§	
	§	CHAPTER 11
SOUTH TEXAS PETROLEUM,	§	
L.L.C.	§	CASE NO. 10-20106
	§	
Debtor.	§	
_____	§	

**EMERGENCY MOTION FOR AN ORDER DIRECTING
JOINT ADMINISTRATION OF BANKRUPTCY CASES**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 20 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

AN EMERGENCY TELEPHONIC HEARING IS REQUESTED FOR FEBRUARY 3, 2010 at 10:00 A.M. CST. INSTRUCTIONS FOR A TELEPHONIC HEARING ARE ENCLOSED WITH THIS GROUP OF MOTIONS.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

USA Dry Van Logistics, LLC ("USA Dry Van"); Golagale Holdings, LLC ("Golagale"); USA Log. Carriers, LLC; USA Logistics Carriers, LLC; North American Trailer Rentals, LLC; LA & G Investment Co, LLC; and South Texas Petroleum, LLC (collectively, the "Debtors"), the Debtors in the above-captioned cases (the "Cases"), hereby file this *Motion for an Order Directing Joint Administration of Bankruptcy Cases* (the "Motion"). In support of the Motion, the Debtors respectfully represent as follows:

I. JURISDICTION, VENUE AND BACKGROUND

1. This Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409(a).

2. On February 2, 2010 (the "Petition Date"), the Debtors filed voluntary petitions for relief under Chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as amended, the "Bankruptcy Code").

3. The Debtors continue to manage and operate their businesses as debtors-in-possession pursuant to §§ 1107 and 1108 of the Bankruptcy Code. No creditors' committee has been appointed in these Cases by the United States Trustee. Further, no trustee or examiner has been requested or appointed.

4. The statutory predicates for the relief requested herein are Rules 1015(b) of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules") and Local Rule 1015 of the Local Court Rules of the United States Bankruptcy Court for the Southern District of Texas.

5. A further description of the background of the Debtors, and the events leading up to the filing of the voluntary petitions by the Debtors is set out in other pleadings.

II. RELIEF REQUESTED

6. By this Motion, the Debtors request an order directing that the above-captioned Cases be consolidated for procedural purposes and jointly administered under the USA Dry Van Logistics case number and caption.

III. BASIS FOR RELIEF

7. Bankruptcy Rule 1015(b) provides that, if two or more petitions are pending in the same court by or against a debtor and an affiliate, the court may order joint administration of the estates of the debtor and such affiliates. *See* Fed. R. Bankr. P. 1015(b).

8. Each Debtor is an affiliate of USA Dry Van and all Debtors are owned directly or indirectly by Sergio F. Lagos and Aurelio "Jim" Aleman, and were controlled by them prepetition. As such, the Debtors are affiliates as that term is defined in Section 101(2) of the Bankruptcy Code and as used in Bankruptcy Rule 1015(b). *See* Organizational Chart attached hereto as Exhibit "A."

9. The joint administration of the Debtors' chapter 11 Cases will permit the Clerk of the Court to use a single general docket for the Debtors and each of the affiliated Cases and to combine notices to creditors and other parties in interest. The Debtors anticipate that numerous notices, applications, motions, other pleadings, hearings, and orders in these Cases will affect the Debtors' estates. Joint administration will save time and money and avoid duplicative and potentially confusing filings, by permitting counsel for all parties in interest to (a) use a single caption on the numerous documents that will be served and filed herein and (b) file the papers in one case rather than for each of the affiliated Debtors. Joint administration will also protect parties in interest by ensuring that parties in interest in each of the affiliated Debtors' respective Chapter 11 Cases will be apprised of the various matters before the Court in all of these Cases.

10. In addition, the Debtors request that the official caption to be used by all parties in all pleadings in the jointly administered Cases be as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

In re:	§	Chapter 11
	§	
USA DRY VAN LOGISTICS, L.L.C.¹, et al.	§	Case No.
	§	
Debtor.	§	Jointly Administered

1. Golagale Holdings, L.L.C.; USA Logistics Carriers, L.L.C.; USA Log. Carriers, L.L.C.; USA Dry Van Logistics, L.L.C.; North American Trailer Rentals, L.L.C.; South Texas Petroleum, L.L.C.; and LA & G Investment Co, L.L.C.. The corporate address for all debtors is 3010 West military, McAllen, Texas 78503. Joint administration under the above style and case number has been ordered by the United States Bankruptcy Court on February 3, 2010. The use of the term "Debtor" shall refer to all debtors.

11. The Debtors submit that use of this simplified caption, naming only USA Dry Van without reference to the subsidiaries of USA Dry Van will eliminate cumbersome and confusing procedures and ensure a uniformity of pleading identification.

12. The Debtors also request that creditors be instructed to file any proofs of claim in the appropriate Debtor case to which the claim relates, with the appropriate style and not to use the style of the jointly administered Cases.

13. The rights of the respective creditors of the Debtors and each of their affiliates will not be adversely affected by joint administration of these chapter 11 Cases because the relief sought by this Motion is purely procedural and is in no way intended to affect substantive rights. Each creditor and other party in interest will maintain whatever rights it has against the particular estate in which it allegedly has a claim or right. Indeed, the rights of all creditors will be enhanced by the reduction in costs resulting from joint administration. The Court also will be relieved of the burden of entering duplicative orders and keeping duplicative files. Finally, supervision of the administrative aspects of the Chapter 11 Cases by the Office of the United States Trustee will be simplified.

14. There are no administrative or scheduling orders previously entered that would require modification upon the entry of an order on this Motion.

15. No previous request for the relief sought in this Motion has been made to this Court or any other Court.

IV. NOTICE

16. The Debtors have caused a copy of this Motion to be served upon (i) the proposed Limited Service List, which includes certain prepetition lenders, known counsel and the consolidated list of the top twenty (20) largest unsecured creditors selected from all seven Debtors; (ii) the United States Trustee (iii) the Internal Revenue Service, (iv) the United States Attorney; and (v) those persons who have formally appeared in these Cases and requested service pursuant to Bankruptcy Rule 2002; and (vi) all other applicable government agencies to the extent required by the Bankruptcy Rules and the Bankruptcy Local Rules. The Debtors submit that no other or further notice need be provided.

WHEREFORE, the Debtors respectfully request that the Court enter an order directing joint administration of the above-captioned Cases and granting such other and further relief as is just and proper.

Dated: _____, 2010

RESPECTFULLY SUBMITTED,

LANGLEY & BANACK, INC.

745 East Mulberry, Suite 900

San Antonio, Texas 78212

(210) 736-6600 [telephone]

(210) 735-6889 [facsimile]

By: _____

R. GLEN AYERS, JR.

State Bar No. 01467500

DAVID S. GRAGG

State Bar No. 08253300

ALLEN M. DeBARD

State Bar No. 24065132

ATTORNEYS FOR THE DEBTOR
AND DEBTOR-IN-POSSESSION

CERTIFICATE OF SERVICE

I hereby certify that on the 2 day of February, 2010, the above and foregoing document was served by the U.S. first class mail, postage prepaid on the parties listed on the Service List attached hereto.



R. GLEN AYERS, JR.

EXHIBIT “A”

EXHIBIT A

**LIMITED SERVICE LIST FOR
USA DRY VAN LOGISTICS, L.L.C., et al.**

Debtors

Golagale Investment Co.,
L.L.C.
LA & G Investment Co.,
L.L.C.
North American Trailer
Rentals, L.L.C.
South Texas Petroleum,
L.L.C.
USA Dry Van Logistics,
L.L.C.
USA Log. Carriers, L.L.C.
USA Logistics Carriers,
L.L.C.
3010 West Military
McAllen, Texas 78503

Debtors' Attorney

R. Glen Ayers, Esq.
David Gragg, Esq.
Allen M. DeBard, Esq.
Langley & Banack, Inc.
745 E. Mulberry, Suite 900
San Antonio, Texas 78216

US Trustee

Office of the US Trustee
Attn: Charles Sterbach
606 North Carancahua Street
Corpus Christi, Texas 78476

Parties-in-Interest

Internal Revenue Service
P. O. Box 21126
Philadelphia, PA 19114

US Attorney

910 Travis, Suite 1500
Houston, Texas 77002

**Secured Creditors and their
counsel:**

General Electric Capital
Corporation
Attn: Hannah L. Blumenstiel
800 Long Ridge Road
Stamford, CT 06927

General Electric Capital
Corporation
Attn: Rob McNabb
201 Main Avenue
Norwalk, CT 06851

J. Douglass Bacon
Stephen R. Tetro II
Latham & Watkins
233 South Wacker Drive,
Suite 5800
Chicago, Illinois 60606

Shelby A. Jordan
Peter Holzer
Jordan, Hyden, Womble,
Culberth & Holzer, P.C
500 N. Shoreline Blvd., Suite
900
Corpus Christi, Texas

**20 Largest Unsecured
Creditors**

**Golagale Investment Co.,
LLC**

Aurelio Aleman
4405 S H ST
McAllen, TX 78503

Everhard & Company
Certified Public Accountants
PO Box 6137
McAllen, TX 78502-6137

George Gomez
2107 La Condesa
Edinburg, TX 78539

Sergio Lagos
2400 San Miguel
Mission, TX 78572

**LA & G Investments Co.,
L.L.C.**

Hidalgo County Tax Office
Hidalgo County Tax Assessor
-Collector
PO Box 178
Edinburg, TX 78540

Art Salinas Engineering And
Supplies
1524 Dove Ave
McAllen, TX 78504

Capital One
Attn: Commercial Loan
Processing Dept.
P.O. Box 4649
Houston, TX 77210-4649

Lone Star National Bank
206 W. Ferguson
Pharr, TX 78577

**North American Trailer
Rentals, L.L.C.**

Capital One Bank
509 S. Main
McAllen, TX 78501

GE Capital Solutions
PO Box 822108
Philadelphia, PA 19182-
2108

Navistar Financial Corp
425 N Martingale Road Ste
1800
Schaumburg, IL 60173

Zions Credit Corporation
PO Box 26536
Salt Lake City, UT 84126-
0536

**South Texas Petroleum,
L.L.C.**

Argus Security Systems
314 Ash
McAllen, TX 78501

Armando Barrera Jr.
P.O. Box 178
Edinburg, TX 78540

Capital One
P.O. Box 650743
Dallas, TX 75265

CS Safety
P.O. Box 4527
McAllen, TX 78501

Department Of Public Safety
6200 Guadalupe Bldg. P
Austin, TX 78752-4019

EXHIBIT A**LIMITED SERVICE LIST FOR
USA DRY VAN LOGISTICS, L.L.C., et al.**

Digital Office System
4800 W. Expressway 83
McAllen, TX 78501

DM2 Software Inc
7700 NE Greenwood
Dr.Ste.200
Vancouver, WA 98662

Everhard & Company
P.O. Box 6137 78502
McAllen, TX 78502-6137

Fleetpride
P.O. Box 847118
Dallas, TX 75284-7118

FMA, INC.
P.O. Box 340021
Austin, TX 78734-0021

French-Ellison Truck Center
4300 N Cage Street
Pharr, TX 78577

GE Capital
P.O. Box 740425
Atlanta, GA 30374-0425

Hose Of South Texas
P.O. Box 9576
Corpus Christi, TX 78469

Marlin Leasing
P.O. Box 13604
Philadelphia, PA 19101

North American
Compliance Services
2390 Central Blvd. Ste, E
Brownsville, TX 78520

Paccar Financial
P.O. Box 676014
Dallas, TX 75267

People's Capital And Leasing
255 Bank Street
Waterbury, CT 06702

Premium Assignment
Corporation
P.O. Box 3100
Tallahassee, FL 32315

Sprint
P.O. Box 4181
Carol Stream, IL 60197-4181

World Fuels Services
1101 5th Ave. Ste. 280
San Rafael, CA 94901

**USA Dry Van Logistics,
L.L.C.**
VIPA

Fletes Pavi
Carr Autotonico Guadalajara

HG Transportaciones

Gonzalez Trucking

Transportes Etola, SA de CV
Carr Mexico Queretaro KM
34.5

R. S. Transfer, SA de CV

Transportadora Jema, SA de
CV
Carretera Mty Monclova KM
5.3

Transportes Villerral Berlang
Carr A Piedras Negras KM
9.7

Central De Fletes Monterrey
SA
KM 21.5 Carr Nuevo Laredo

TNL Express SA de CV
Carr Aeropuerto KM 1-A

Transportes Especial
Autorizada SA
Carr Nacional KM 14

Velotrans, SA de CV
Independencia No. 110

Grupo Camionera Regional

Autolineas MH, SA de CV
Carratera Laredo KM 26

Super Transporte
Internacional
Carr Piedras Negras KM 17

Auto Express Hercules, SA
de CV
Camino Escobedo-El
Carmen NO

Rocio Karina Gutierrez De
Hoyo
La Paz 220
McAllen, TX 78503

Carga Tamez, SA de CV
Chihuahua 4305
Nuevo Laredo, TM
Mexico

Transportes Americanos

Transportadora Egoba, SA
de CV

USA Log. Carriers, L.L.C.
Capital One, NA
PO Box 650743
Dallas, TX 75265-0743

Comdata
PO Box 845738
Dallas, TX 75284-5738

Gallagher Bassett Services,
Inc.
8 Flowers Drive
Attn: Sally Mixell
Mechanicsburg, PA 17050

Cintas Corporation #538
700 Dawson Road
Mercedes, TX 78570

Southern Tire Mart
6875 Speedway Blvd., Suite
U-105
Las Vegas, NV 89115

Comcover Group, Inc.
2800 West State Road 84
Suite 116
Fort Lauderdale, FL 33312

EXHIBIT A

LIMITED SERVICE LIST FOR
USA DRY VAN LOGISTICS, L.L.C., et al.

Skybiz, Inc.
22455 David Drive, Suite 100
Sterling, VA 20164

French Ellison Truck Center
PO Box 200187
San Antonio, TX 78220

Hollon Oil Company
1300 Davenport
Weslaco, TX 78596

TMW Systems, Inc.
c/o US Bank
PO Box 643562
Cincinnati, OH 45264-3562

Peoplenet
NW 5489
PO Box 1450
Minneapolis, MN 55485-5489

Button McCumber & Cortez,
LLP
PO Box 5238
Brownsville, TX 78523-5238

Securities Security Services
USA
12672 Collections Center
Chicago, IL 60693

Blackhawk Security &
Investigations
PO Box 1311
Mission, TX 78573-1311

National Interstate
3250 Interstate Drive
Richfield, OH 44286-9000

North American Compliance
820 W. Price Road
Brownsville, TX 78520

Jackson Walker LLP
PO Box 130989
Dallas, TX 75313-0989

The Center of Industrial
Rehabilitation
709 S. Broadway
McAllen, TX 78501

Michelin North America, Inc.
PO Box 100860
Atlanta, GA 30384-0860

USA Logistics Carriers,
L.L.C.
FCC Equipment Financing
Bank One
Lockbox 905010
906 Tyvola Rd., Suite 108
Charlotte, NC 28217

Peoples Capital and Leasing
255 Bank Street, 4th Floor
Waterbury, CT 06702

Marquette Equipment
Finance
6975 Union Park Center, Ste.
200
Midvale, UT 84047

GE Capital
PO Box 532617
Atlanta, GA 30353-2617

Bank of America Leasing &
Capital
KBROPH Mail Code IL 1-
231-07-28
231 South LaSalle Street
Chicago, IL 60604

CSI Leasing, Inc.
PO Box 775486
St. Louis, MO 63177-5485

Paccar Financial Corp.
PO Box 676014
Dallas, TX 75267-6014

Alter Moneta Corp.
50 Lakefront Blvd.
Buffalo, NY 14202

Capital One Equipment
Dept. 153
PO Box 4889
Houston, TX 77210-4869

Center Capital Corporation
PO Box 330
Hartford, CT 06141-0330

Regions Equipment Finance
Corp.
PO Box 11407
Birmingham, AL 35246-1090

Navistar Financial
PO Box 96070
Chicago, IL 60693-6070